



November 8, 2022

**Via ECF and Email**

Hon. Martin Glenn  
Chief U.S. Bankruptcy Judge  
U.S. Bankruptcy Court, SDNY  
One Bowling Green  
New York, New York 10004

**In re:                    In re Lawrence A. First, Chapter 11 Debtor**  
**S.D.N.Y. Case No. 22-11020**

Dear Hon. Judge Glenn:

I write with respect to the Motion to Dismiss the bankruptcy case filed by creditors ASCP, LLC and Ascribe Associates III, LLC (collectively, "Ascribe") which was originally noticed for November 2, 2022 and adjourned on consent, at the request of Debtor's counsel, to November 16, 2022. Unfortunately, the undersigned is no longer available on November 16, 2022 due to an all day mediation scheduled before Lori Lapin Jones, Esq., which involves multiple parties and for which scheduling was extremely difficult to coordinate.

Last week I contacted Ascribe's counsel who consented to a further adjournment of the Motion to either November 29 or December 1, which dates were provided by Chambers. However, Avery Samet, Esq., the Debtor's special litigation counsel is on trial that week. The Debtor believes that Mr. Samet's presence at the hearing is critical as many of the issues raised in the Motion pertain to the arbitration which Mr. Samet is exclusively handling. Although the Court provided December 15, 2022 as the next available hearing date, Ascribe's counsel was not authorized to consent to any dates beyond December 1, 2022.

Based upon the foregoing, the undersigned requests that the Court grant a further adjournment beyond December 1, 2022. Thank you for your consideration of this request.

Respectfully,

*/s/ Erica R. Aisner*  
Erica R. Aisner

ERA/

cc: Nathan Schwed, Esq.  
Jantra Van Roy, Esq.  
Avery Samet, Esq.